

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PRESIDENT DONALD J. TRUMP, 45th President of the United States of America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New York corporation,
ROBERT WOODWARD p.k.a. BOB WOODWARD, an
individual, and PARAMOUNT GLOBAL, a Delaware
corporation, f/k/a Viacom Inc., successor by merger to CBS
Corporation, a Pennsylvania corporation f/k/a
Westinghouse Electric Corporation,

Defendants.

1:23-cv-06883-PGG

UNOPPOSED MOTION FOR EXTENSION OF TIME TO COMPLY WITH COURT ORDER [D.E. 66]

Plaintiff, President Donald J. Trump, 45th President of the United States of America, in his individual capacity (“Plaintiff”), respectfully submits this unopposed motion to extend the time to file a Second Amended Complaint in compliance with this Court’s Order dated November 2, 2023 [D.E. 66], and in support thereof states as follows.

1. On November 1, 2023, Plaintiff’s counsel filed a letter in this matter advising this Honorable Court of the Copyright Office’s issuance of a Certificate of Registration in Plaintiff’s name. Thereafter, on November 2, 2023, Defendants filed their response. *See* D.E. 64 and 65.

2. In response, on November 3, 2023, this Honorable Court entered an order instructing the Plaintiff to file an amended complaint in this action by November 8, 2023,

specifying the deadlines for filing of Defendants' renewed motion to dismiss as well as opposition and reply papers. *See* D.E. 66.

3. Due to the press of other matters, and due to a speaking engagement out of the state, Plaintiff's counsel requires additional time to file an amended complaint. For that reason, Plaintiff respectfully requests that this Honorable Court extend Plaintiff's deadline to file the Amended Complaint to Monday, November, 13, 2023.

4. **Undersigned counsel conferred with counsel for the Defendants in advance of filing this motion, and the latter has consented to the subject extension, provided that the various briefing deadlines are extended as follows:**¹ (i) Defendants' deadline to serve motion to dismiss – November 22, 2023; Plaintiff's deadline to serve opposition papers – November 30, 2023; Defendants' deadline to serve reply (and deadline for parties to file motions per bundling rule) – December 6, 2023). Undersigned counsel consents to these proposed deadlines.

5. For the reasons set forth above, Plaintiff respectfully submits this unopposed motion seeking entry of an order granting Plaintiff's request to file his amended complaint on or before November 13, 2023 and for the revision of the briefing schedule in accordance with paragraph four hereof, and for entry of any other relief the Court deems appropriate.

Dated: November 8, 2023

¹ The office of the undersigned counsel contacted Chambers earlier today to indicate that this Motion was being filed and that the delay in the filing time was due to the inability to access ECF while traveling via airplane.

GS2 LAW PLLC

By: /s/ Robert Garson

Robert Garson

Yanina Zilberman

(pending *pro hac vice*)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2023, I filed the foregoing Unopposed Motion, which will send an electronic notice to counsel of record per the service list below.

/s/ Robert Garson

Service List

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*Attorneys for Robert Woodward,
Simon & Schuster, Inc. and Paramount Global*

SO ORDERED.

A handwritten signature in black ink, reading "Paul G. Gardephe". The signature is written in a cursive, flowing style. The first name "Paul" is written in a larger, more prominent script, followed by "G." and "Gardephe".

Paul G. Gardephe
United States District Judge
Date: November 9, 2023